

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

GILBERTO GONZALEZ CRUZ  
YVETTE MARTINEZ SANCHEZ

CASE NO. 18-04884  
CHAPTER 13

DEBTOR(S)

MOTION TO OBJECT CONFIRMATION OF PLAN

TO THE HONORABLE COURT:

**COMES NOW**, ASOCIACION RESIDENTES PARQUE LAS HACIENDAS through the undersigned attorney, and respectfully, prays and states as follows:

1. Asociación Residentes Parque Las Haciendas is a secured creditor having a registered mortgage deed.
2. Creditor has filed a proof of claim for \$2,940.00 for pre-petition arrears.
3. The proposed Plan should not be confirmed because debtor does not contemplate the amount in arrears owed to Asociación Residentes Parque Las Haciendas.

**WHEREFORE**, the creditor respectfully request that this Honorable Court deny the confirmation of the Plan and issue orders as may be just and proper.

**NOTICE**

"Parties in interest are hereby granted twenty one (21) days from the date of this notice to request hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejection should be denied."

**I hereby certify:** That on October 5<sup>th</sup>, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **José R. Carrión Morales**. I hereby certify: that I have mail by the United States Postal Service the document to the following non CM/ECF participants: **to all creditors**.

In Ponce, Puerto Rico, this 5<sup>th</sup> day of October 2018.

**RESPECTFULLY SUBMITTED.**

***/s/Rafael Colón Flores***

**Rafael Colón Flores**

Attorney for Debtor

U.S.D.C.P.R. 128203

1129 Muñoz Rivera Ave. STE 1

Ponce, P.R. 00717-0635

Tel. (787) 842-1039

Fax. (787) 284-0325

E-mail: colonflores@hotmail.com